

McDermott Will & Emery

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February 1, 2016

BY EMAIL AND U.S. MAIL

Evan Norris
Assistant United States Attorney
U.S. Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

Re: Media and Documents Seized from CONMEBOL Headquarters

Dear Evan:

On January 7, 2016, Paraguayan authorities conducted an unannounced search and seizure at CONMEBOL's headquarters and took custody of various media and documents belonging to CONMEBOL. We understand that the Paraguayan authorities were acting on behalf of or in conjunction with the EDNY.

We believe that at least some of the seized media and documents contain attorney-client privileged material, including CONMEBOL's communications with its McDermott attorneys and other counsel. CONMEBOL seeks to protect its privileges to the fullest extent possible. We therefore request that any seized material be first reviewed by individuals unaffiliated with the EDNY prosecutorial team so that any privileged material can be identified and segregated or redacted. To assist with this process, we are enclosing a list of law firms and counsel who may have engaged in privileged communications with CONMEBOL. This list is not exhaustive and does not limit CONMEBOL's privilege claims in any way.

Sincerely,



Michael Kendall
Enclosure

cc: Samuel Nitze
Kristin Mace
Brian Morris
Andrew E. Tomback
Todd D. Harrison

DM_US 69847009-2.097299.0011

U.S. practice conducted through McDermott Will & Emery LLP.

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**Non-Exhaustive List of Counsel Who May Have Engaged in
Privileged Communications With CONMEBOL**

General Counsel

Dr. Alfredo Antonio Montanaro (aamonta@gmail.com)

Daniel Elicetche & Associates (working on behalf of counsel)

Dr. Daniel Elicetche (daniel.elicetche@dea.com.py)

Allende & Brea

Diego Botana (db@allendebrea.com.ar)

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